

REMARKS

Present Status of the Application

The Office Action rejected claims 1-12 under 35 U.S.C. 112, 1st paragraph as failing to comply with the written description requirement.

The Office Action rejected claims 1, 2, 4, 5, 7, 8, 10, and 11 under 35 U.S.C. 103(a) as being unpatentable over Van Den Branden EP 1056297 (Branden hereinafter) in view of admitted prior art (APA).

Response To Claim Rejections Under 35 U.S.C. Section 112, 1st Paragraph

Claims 1-12 are rejected under 35 U.S.C. 112, 1st paragraph as failing to comply with the written description requirement.

Applicants respectfully disagree with the Examiner and hereby otherwise traverse these rejections.

With respect to claim 1, it recites "... executing debug analysis comprising syntax and semantics pre-check on the entire compressed image after the entire compressed image having been received". The Examiner contended: "Applicant only mentions references the 'entire compressed image' once in paragraph 27. However one of ordinary skill in the art would not interpret the invention as described in the specification to be limited in this manner".

In rejecting claim 1, although the Examiner admitted "This paragraph (paragraph 27) implies the debug analysis is performed on the entire compressed image before the compressed data is decoded, this can also be seen in figure 3 where the analyzing is completed prior to the pipelined decoding process", the Examiner believes "nowhere in

the specification does it recite or imply that the entire performing debug analysis on the entire compressed image must be performed after the entire compressed image picture having been received”.

Applicants submit that there is no where in the patent law requiring that the claimed subject matter must be mentioned more than once for satisfying the written description requirement. Instead, as clearly defined in M.P.E.P. §2163.02 Standard for Determining Compliance With the Written Description Requirement, the courts have described the essential question to be addressed in a description requirement issue in a variety of ways. An objective standard for determining compliance with the written description requirement is, **"does the description clearly allow persons of ordinary skill in the art to recognize that he or she invented what is claimed."** *In re Gosteli*, 872 F.2d 1008, 1012, 10 USPQ2d 1614, 1618 (Fed. Cir. 1989). Under *Vas-Cath, Inc. v. Mahurkar*, 935 F.2d 1555, 1563-64, 19 USPQ2d 1111, 1117 (Fed. Cir. 1991), **to satisfy the written description requirement, an applicant must convey with reasonable clarity to those skilled in the art that, as of the filing date sought, he or she was in possession of the invention, and that the invention, in that context, is whatever is now claimed.** The test for sufficiency of support in a parent application is whether the disclosure of the application relied upon "reasonably conveys to the artisan that the inventor had possession at that time of the later claimed subject matter." *Ralston Purina Co. v. Far-Mar-Co., Inc.*, 772 F.2d 1570, 1575, 227 USPQ 177, 179 (Fed. Cir. 1985) (quoting *In re Kaslow*, 707 F.2d 1366, 1375, 217 USPQ 1089, 1096 (Fed. Cir. 1983)).

The claimed subject matter is almost literally recited or rewritten from paragraph

27, and as admitted by the Examiner it can also be seen in figure 3.

Applicants submit that the written description requirement does not restrict the specification to be drafted in a **MUST BE** manner. On the contrary, the Applicant is only required to convey with reasonable clarity to those skilled in the art that, as of the filing date sought, he or she was in possession of the invention.

As disclosed in paragraph 27 and Fig. 3, Applicants had clearly and definitely conveyed the possession the concept of what is claimed to one of ordinary skill in the art. And therefore, the written description requirement has been well satisfied with respect to claim 1 and no new matters are introduced in view of such amendments.

Claim 3 is rejected for the similar reason with respect to claim 1. The Examiner contended: “there is no evidence to suggest that the ‘entire compressed image’ should be reloaded. Although reloading the compressed image is disclosed this does not imply that the entire compressed image be reloaded, it is common in the art to reload an image by reloading only a corrupted part.

Applicants submit that, as clearly defined in M.P.E.P. §2163.02 Standard for Determining Compliance With the Written Description Requirement, “The subject matter of the claim need not be described literally (i.e., using the same terms or *in haec verba*) in order for the disclosure to satisfy the description requirement.” Although “the entire compressed image be reloaded” not literally disclosed, it has been implied in the specification and the drawings that “when the variable length decoding unit performs the debug analysis on the **entire** compressed image picture and finds an error data, the **entire compressed image picture** is reloaded, so as to perform **the debug analysis on the entire compressed image picture again**”.

In paragraph 27, it has been disclosed: “the debug analysis is performed on the **entire compressed image picture** first, and when the result of the debug analysis indicates that there is no error data, it is determined that **the compressed image picture** is suitable for the subsequent decoding operation”. In the above teaching, those of ordinary skill in the art should be very sure that the later recited “compressed image picture” is exactly the same of the formerly recited “**entire compressed image picture**”.

Applicants submit that the specification should be consistently understood in its entirety. As such the teaching “When error data is found, the compressed image picture is reloaded, and the debug analysis is performed on the compressed image picture again, so as to avoid wasting the system resource due to decoding the error data” in paragraph 29, implies to reload “the **entire compressed image picture**” when talking about “the compressed image picture”. As such claim 3 is submitted to be allowable over the written description requirement.

Claim 4 is rejected for the similar reason of claim 3, and therefore claim 4 is allowable for the similar reason of claim 3.

Claim 5 is rejected for the similar reason of claim 4, and therefore claim 5 is allowable for the similar reason of claim 5.

Claims 2 and 6 are rejected as containing new matter because they depend from claim 1.

Claim 1 is now submitted to be allowable and therefore claims 2 and 6 now depend on allowable independent claim 1, and therefore should be also allowable.

Claims 7-12 are rejected for similar reasons with respect to claims 1-6, and therefore for at least the foregoing reasons discussed above, claims 7-12 are submitted to be allowable.

Response To Claim Rejections Under 35 U.S.C. Section 103

Claims 1, 2, 4, 5, 7, 8, 10, and 11 are rejected under 35 U.S.C. 103(a) as being unpatentable over Branden in view of APA.

In response thereto, Applicants hereby otherwise traverse these rejections.

Claim 1, as previously presented, recites in part:

An image decompressing circuit, comprising:

a variable length decoding unit, for receiving a compressed image picture and **executing a debug analysis comprising syntax and semantics pre-check on the entire compressed image picture** after the entire compressed image picture having been received, wherein **when a result of the debug analysis indicates that the entire compressed image picture is suitable for a subsequent decoding operation, executing a decoding process** in pipeline on the compressed image picture;

...

(emphasis added)

Claim 7, as previously presented, recites in part:

A method of decompressing images, comprising:

...

executing a debug analysis comprising syntax and semantics
pre-check on the entire compressed image picture after the entire
compressed image picture having been received, wherein when a result of
the debug analysis indicates that the compressed image picture is suitable
for a subsequent decoding operation, executing a decoding operation on
the compressed image picture with a pipeline process

...

(Emphasis Added)

Applicants submit that Branden, APA, along or in combination, fail to teach the limitation of “executing a debug analysis comprising **syntax and semantics pre-check on the entire compressed image picture** after the entire compressed image picture having been received, wherein when a result of the debug analysis indicates that the entire compressed image picture is suitable for a subsequent decoding operation, executing a decoding process”.

Specifically, Applicants believe that Branden and APA fail to teach “**syntax and semantics pre-check on the entire compressed image picture**” at all, which is required by the claimed invention as set forth in claims 1 and 7.

The Examiner interprets “examining marker bits” (paragraph 59) as reading on “executing a debug analysis”.

“Examining marker bits” is discussed in paragraph 59 by referring to Figure 8.

As shown in Figure 8, during the process of the mentioned “examining marker bits”, whether a TS packet 201 is lost (step 820), corrupted (step 830), or late (step 840) are determined sequentially. All of these determinations are made with respect to the completeness of the data.

FIG. 8

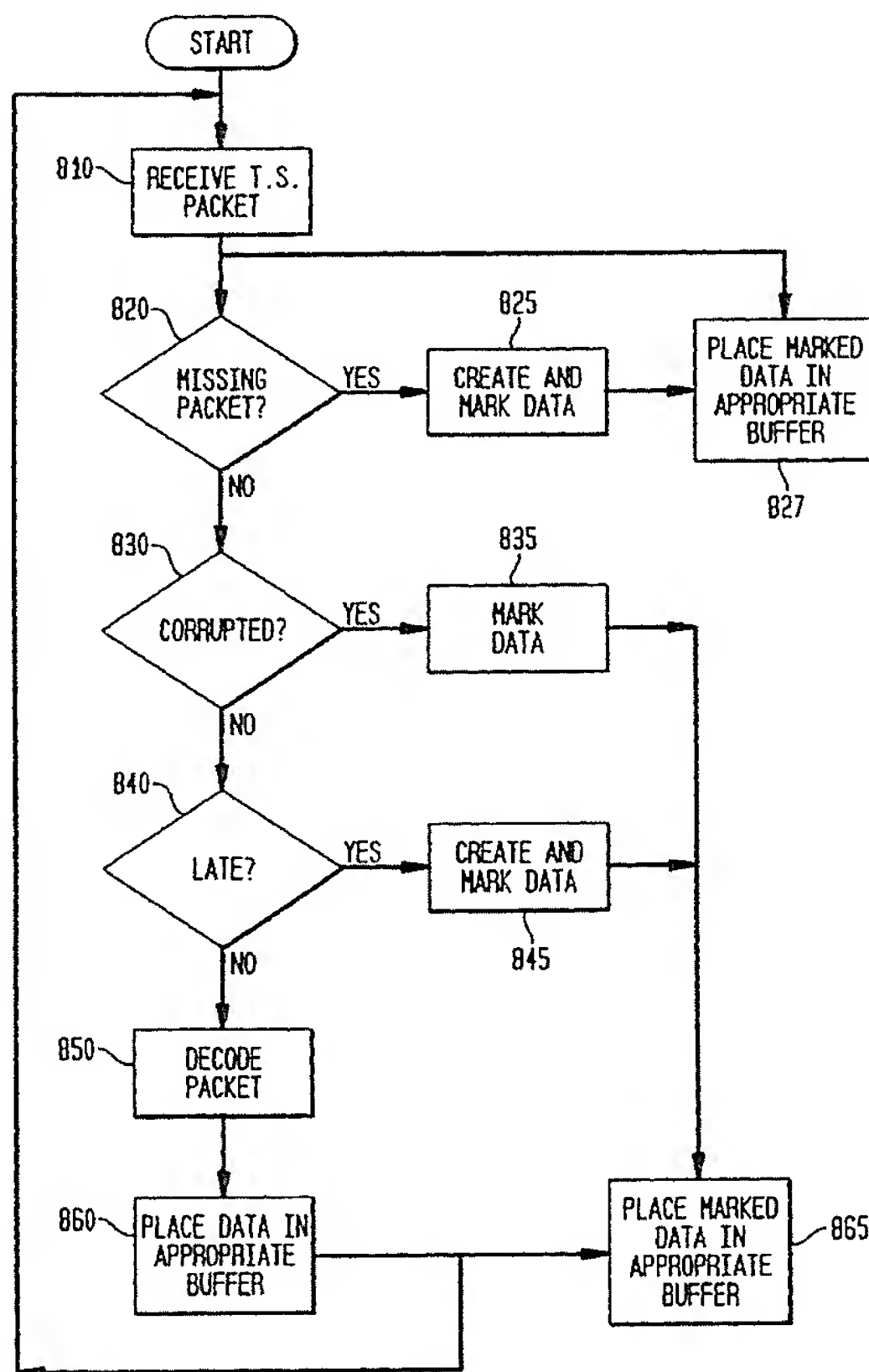
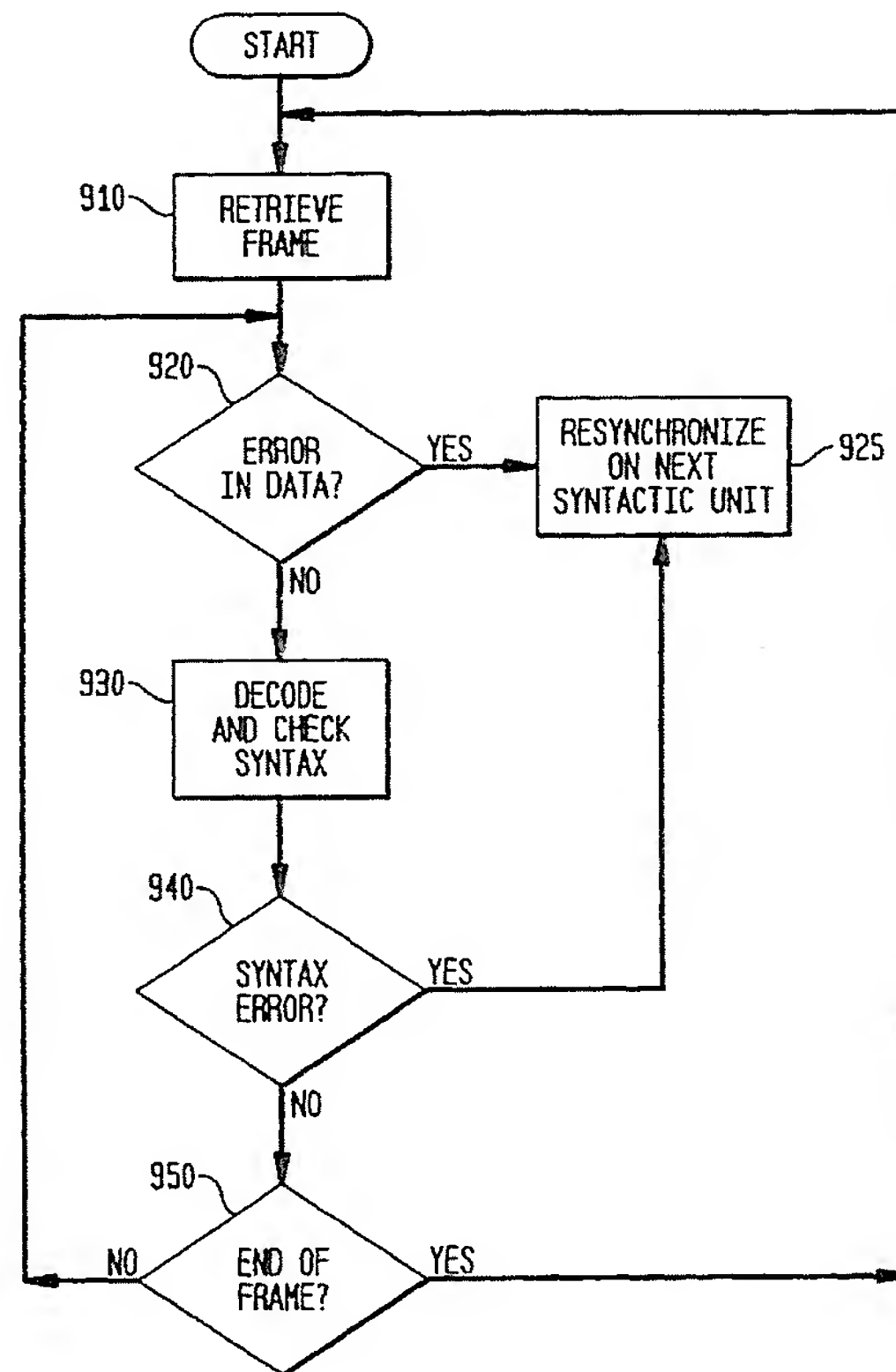


FIG. 9



In this concern, the alleged “examining marker bits” (paragraph 59) does not comprise “syntax and semantics pre-check on the entire compressed image picture”.

The Examiner contended “marker bits can include markers for syntax and semantic errors”. However, this is not taught by Branden. On the contrary, the as shown in Figure 8, none of the marker bits includes markers for syntax and semantic errors.

Further, as shown in Figure 9, Branden teaches: “at step 920, the audio or video decoder 730, 740 examines a first portion of the frame of audio or video bitstream data to determine whether that bitstream data includes erroneous data” (paragraph 0069). Please note, in the step 920, only the completeness of the data is determined, and there is no syntax and semantics pre-check executed thereby. Although the Examiner tried to interpret the marker bits as including markers for syntax and semantic errors, Branden in fact fails to teach any syntax and semantic check process decoding, as shown in Figure 9.

Branden further teaches “when it is determined that no data in the first portion of the frame of bitstream data is accompanied by a set marker bit, the audio or video decoder 730, 740 proceeds to step 930. **At step 930**, the audio or video decoder 730, 740 **decodes** the first portion of bitstream data in frame of audio or video bitstream data **and checks** the syntax of the audio and video bitstreams ...” (paragraph 0070).

As such, Branden teaches to decode a portion of bitstream data in frame, rather than the entire compressed image picture. And further, Branden teaches to decode **and checks** the syntax in a same step. Therefore, the result of the checking the syntax does not affect the decoding operation. And therefore, Branden fails to teach “when a result of the debug analysis indicates ..., executing a decoding process”.

Briefly, as shown in Figures 8 and 9, Branden teaches to decode, and check the syntax at the same time, so that Branden can find out syntax error when or after the decoding process. Therefore, the decoding process is to be executed without being affected by a syntax error.

On the contrary, the claimed invention, requires “**executing a debug analysis comprising syntax and semantics pre-check**” before decoding, so that the decoding

process can be executed according to a result of the debug analysis.

For at least the foregoing reasons, Applicants respectfully submit that Branden, APA, or any of the other cited references, taken alone or in combination, do not teach each and every element in claims 1 and 7. Independent claims 1 and 7 are patently defined over the prior art references of record, and should be allowed.

If independent claims 1 and 7 are allowable over the prior arts of record, then its dependent claims 2-6 and 8-12 are allowable as a matter of law.

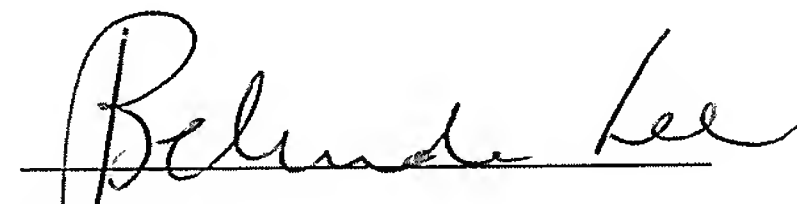
CONCLUSION

For at least the foregoing reasons, it is believed that the pending claims 1-12 are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

Respectfully submitted,

Date :

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